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17 [*Additional Counsel Listed on Following Page*]

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,  
22 PASSENGER SEXUAL ASSAULT  
23 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF RANDALL S. LUSKEY  
IN SUPPORT OF DEFENDANTS' REPLY IN  
SUPPORT OF MOTION FOR A  
PROTECTIVE ORDER**

24 This Document Relates to:

25 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros  
Date: March 21, 2025  
Time: 1:00 p.m.  
26 Courtroom: G – 15th Floor  
27  
28

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**DECLARATION OF RANDALL S. LUSKEY**

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am over 18 years of age, of sound mind, and competent to make the statements in this declaration. I am an attorney at law duly licensed to practice before all courts of the State of California and a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC in the above-captioned matter. I have personal knowledge of the facts set forth herein, except where stated upon information and belief, and if called as a witness to testify, I could and would competently testify as to the truth of the same if requested to do so.

2. I submit this declaration in support of Defendants' Reply in Support of Motion for a Protective Order, filed on March 20, 2025.

3. Attached to this declaration as **Exhibit 1** is a true and correct copy of a document bearing beginning Bates stamp UBER\_JCCP\_MDL\_001269170 and associated metadata cover sheet.

4. Attached to this declaration as **Exhibit 2** is a true and correct copy of excerpts of the certified transcript of the November 19, 2024 Deposition of Roger Kaiser.

5. Attached to this declaration as **Exhibit 3** is a true and correct copy of the metadata cover sheet associated with Plaintiffs' Exhibit 60, a document bearing beginning Bates stamp UBER000051894.

6. Attached to this declaration as **Exhibit 4** is a true and correct copy of the metadata cover sheet associated with Plaintiffs' Exhibit 64, a document bearing beginning Bates stamps UBER000212419.

7. Attached to this declaration as **Exhibit 5** is a true and correct copy of the metadata cover sheet associated with Plaintiffs' Exhibit 65, a document bearing beginning Bates stamps UBER000187361.

1           8.       Attached to this declaration as **Exhibit 6** is a true and correct copy of the metadata  
2 cover sheet associated with Plaintiffs' Exhibit 67, a document bearing beginning Bates stamps  
3 UBER000178156.

4           9.       Attached to this declaration as **Exhibit 7** is a true and correct copy of the metadata  
5 cover sheet associated with Plaintiffs' Exhibit 69, a document bearing beginning MDL Bates  
6 stamps UBER\_JCCP\_MDL\_000093920.

7           10.      Attached to this declaration as **Exhibit 8** is a true and correct copy of the metadata  
8 cover sheet associated with Plaintiffs' Exhibit 70, a document bearing beginning Bates stamps  
9 UBER000142572.

10          11.      Attached to this declaration as **Exhibit 9** is a true and correct copy of the metadata  
11 cover sheet associated with Plaintiffs' Exhibit 85, a document bearing beginning Bates stamps  
12 UBER\_JCCP\_MDL\_000959559.

13          12.      Attached to this declaration as **Exhibit 10** is a true and correct copy of the metadata  
14 cover sheet associated with Plaintiffs' Exhibit 86, a document bearing beginning Bates stamps  
15 UBER000051449.

16          13.      Attached to this declaration as **Exhibit 11** is a true and correct copy of the metadata  
17 cover sheet associated with Plaintiffs' Exhibit 87, a document bearing beginning Bates stamps  
18 UBER000206600.

19          14.      Attached to this declaration as **Exhibit 12** is a true and correct copy of the metadata  
20 cover sheet associated with Plaintiffs' Exhibit 88, a document bearing beginning Bates stamps  
21 UBER\_JCCP\_MDL\_000214321.

22          15.      Attached to this declaration as **Exhibit 13** is a true and correct copy of the metadata  
23 cover sheet associated with Plaintiffs' Exhibit 89, a document bearing beginning MDL Bates  
24 stamps UBER\_JCCP\_MDL\_001720742.

25          16.      Attached to this declaration as **Exhibit 14** is a true and correct copy of the metadata  
26 cover sheet associated with Plaintiffs' Ex. 170, a document bearing beginning bates stamp  
27 UBER000094334.

